## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

Debtors. : (Jointly Administered)

SUMMARY SHEET PURSUANT TO UNITED STATES TRUSTEE GUIDELINES FOR REVIEWING APPLICATIONS FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES FILED UNDER 11 U.S.C. §§ 330 AND 331

PERIOD OF NOVEMBER 1, 2009 TO NOVEMBER 30, 2009

Name of Applicant: Richard Snowden, Queen's Counsel

Authorised to provide professional services to:

The estate of Lehman Brothers
Holdings, Inc *et al*, as an ordinary

course professional

Date of retention: May 15, 2009

Exchange rate for the period November 1 2009 to 1GB£ = US\$1.648 (as at 30 November

November 30, 2009 (the **Period**): 2009 (the **Exchange Rate**)

Fixed brief hearing fee (**Brief Fee**) incurred during GB£50,000 (US\$82,400 – calculated

the Period: using the Exchange Rate)

Fixed daily refresher hearing fee (**Refresher**): GB£6500 per day pro rata (US\$10,712 – calculated using the Exchange Rate)

- calculated using the Exchange Nate)

Total daily Refresher fees (including pro rata days)
GB£43,250 (US\$71,276 – calculated using the Exchange Rate)

Applicant's hourly rate: GB£750 per hour (US\$1,236 per hour

- calculated using the Exchange Rate)

Total hours incurred in addition to Brief Fee and 27.334 hours Refresher during the Period:

Fees sought for payment for the Period (excluding VAT):

GB£113,750 (US\$187,460 -calculated using the Exchange Rate)

Total fees sought for payment for the Period GB£130,812.50 (US\$215,579.00 – calculated using the Exchange Rate)

SOUTHERN DISTRICT OF NEW YORK	
	x :
In re	: Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (JMP)
Debtors.	: (Jointly Administered)

APPLICATION OF RICHARD SNOWDEN QC FOR AN AWARD OF COMPENSATION FOR THE PERIOD NOVEMBER 1, 2009 TO NOVEMBER 30, 2009

TO THE HONORABLE JAMES M. PECK, UNITED STATES BANKRUPTCY JUDGE:

Richard Snowden, Queen's Counsel (QC), authorised to provide legal services as an Ordinary Course Professional to Lehman Brothers Holdings, Inc (LBHI) and its affiliated debtors in the above captioned chapter 11 cases (together referred to as Lehman or the Debtors), makes this application pursuant to sections 330 and 331 of chapter 11 of Title 11 of the United States Code, 11 U.S.C. § 101 et seq (Bankruptcy Code), and the Amended Order Pursuant to Section 105(a), 327, 328 and 330 of the Bankruptcy Code Authorizing the Debtors to Employ Professionals Utilized in the Ordinary Court of Business Order, dated March 25, 2010 (Ordinary Course Professional Order), for an award of compensation for professional services rendered to the Debtors (Application) in the amount of GB£130,812.50 (US\$215,579.00), incurred during the period November 1, 2009 to November 30, 2009 (Period).

### **INTRODUCTION**

- 1. On September 15, 2008 and periodically thereafter (Commencement Date), LBHI and certain of its subsidiaries filed voluntary cases under chapter 11 of the Bankruptcy Code. The Debtors' chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (Bankruptcy Rules). The Debtors are authorised to operate their businesses and manage their properties as debtors-in-possession pursuant to section 1107(a) and 1108 of the Bankruptcy Code.
- 2. Due to the scope of the Debtors' business, on October 13, 2008, the Debtors filed a motion (**Ordinary Course Professional Motion**) seeking authorisation pursuant to section 105(a), 327, 328 and 330 of the Bankruptcy Code, to retain, *nunc pro tunc* to the Commencement Date, professionals utilized in the ordinary course of business (**Ordinary Course Professionals**) without the submission of separate retention applications and the issuance of separate retention orders for each individual professional.
- 3. The Ordinary Course Professional Motion was granted by Order dated November 5, 2008 and was amended on March 25, 2010 (**Ordinary Course Professional Order**). The Ordinary Course Professional Order outlines the procedures that all Ordinary Course Professionals must follow in order to receive compensation and reimbursement of expenses for services provided to the Debtors. With respect to any Ordinary Course Professional seeking compensation in excess of US\$150,000 in any given month, the Ordinary Course Professional Order provides, in pertinent part:

"that in the event that an Ordinary Course Professional seeks more than US\$150,000 per month, that professional will be required to file a fee application for the full amount of its fees and expenses for that month in accordance with sections 330 and 331 of the Bankruptcy Code, the [Bankruptcy Rules], the Local Bankruptcy Rules for the Southern District of New York, the Fee Guidelines promulgated by the US Trustee, and any and all orders of the Court ..."

- 4. In October 2009, the Debtors filed a Notice of List of Ordinary Course Professionals (Ordinary Course Professional Application) with the United States
  Bankruptcy Court Southern District of New York listing Richard Snowden QC as an
  Ordinary Course Professional and attaching thereto the relevant Ordinary Course Professional
  Affidavit and Retention Questionnaire. Because no objections were timely filed with respect to such notice, the retention, employment and compensation of Richard Snowden QC was deemed approved pursuant to section 327 and 328 of the Bankruptcy Code without the need for a hearing and without further order from the Court.
- 5. This Application is made by Richard Snowden QC for an allowance of fair and reasonable compensation for professional services rendered by him during the Period, consistent with the results achieved, the time, labour and expertise brought to bear on the problems presented and other related factors. The amounts sought for compensation for professional services are at the hourly rates customarily charged by Richard Snowden QC for legal services rendered by him and are in line with the rates charged by QC barristers (specialist trial lawyers) operating in a competitive market for legal services in England.
- 6. The materials in support of this application are not being filed with the Court, but copies thereof will be delivered to (i) the Court; (ii) the U.S. Trustee; (iii) the Debtors; (iv) the attorneys for the Creditors' Committee; and (iv) counsel for the Debtors.
- 7. The professional services for which compensation is sought were rendered in the ordinary course of the Debtors' business and solely on behalf of LBHI and its debtor affiliates.

## PRELIMINARY STATEMENT

### The Debtors

8. Prior to the events leading up to these chapter 11 cases, Lehman was the fourth largest investment bank in the United States. For more than 150 years, Lehman had been a leader in the global financial markets, serving the financial needs of corporations,

governmental units, institutional clients and individuals worldwide. Its headquarters in New York and regional headquarters in London and Tokyo were complimented by a network of offices in North America, Europe, the Middle East, Latin America and the Asia Pacific Region.

9. Additional information regarding the Debtors' business, capital structures and the circumstances leading to chapter 11 filings is contained in the Affidavit of Ian T. Lowitt pursuant to rule 1007-2 of the Local Bankruptcy Rules for the Southern district of New York in Support of the First-Day Motions and Applications, filed on September 15, 2008 [Docket No. 2]

## Richard Snowden QC

- 10. Richard Snowden QC is in private practice as a barrister and is a member of the Bar of England and Wales. He was called to the Bar in 1986. In 2003 he was appointed to the rank of Queen's Counsel. QCs are appointed by the Queen on the advice of an Independent Panel. The rank is awarded to those who display outstanding advocacy skills in the Courts of England and Wales.
- barristers and solicitors. In general, commercial clients retain a firm of solicitors to act for them in litigation and do not instruct barristers directly. Individual barristers are then retained by solicitors as specialist advisers and trial advocates on a case-by-case basis.

  Barristers and solicitors routinely work in conjunction with each other during the course of litigation, but in almost all major cases, barristers are instructed by the solicitors to prepare and conduct the trial proceedings in court. In this respect, in terms of US terminology, barristers perform the functions that 'trial lawyers' perform in the US.

- 12. Barristers in private practice are, however, not members of a law firm. They are self-employed and do not operate in partnership or share profits. Groups of barristers will, however, associate within 'chambers' from shared premises, each contributing to the expenses of the premises and support services. Richard Snowden QC is a member of the chambers known as Erskine Chambers at 33 Chancery Lane, London, WC2A 1EN, UK.
- and attending on the first day of a court hearing to be agreed in advance of the hearing as a fixed fee (the **Brief Fee**). The Brief Fee is proposed to, negotiated and agreed with the instructing solicitor and on agreement becomes due for payment to the barrister. Where a hearing is expected to last longer than one day it is also customary to agree an additional daily fee, a refresher fee (**Refresher**), to apply to each further day of the hearing (and including work during the remainder of the normal business day in preparation for next day's hearing). The Brief fee will, in addition to all pre-hearing preparatory work and the first day of the hearing, include further preparatory work that may be undertaken during the course of the hearing over and above the normal business day covered by a Refresher and may, in a simple case, include attending court for the delivery of a reserved judgment.
- 14. For the purposes of agreeing a Brief Fee, it is customary to take into account the following factors: the nature of the case and its value, importance and complexity; the experience and standing of the barrister instructed; the amount of work likely to be involved for all pre hearing preparation; the anticipated length of the hearing; the diary commitment required if the case is fixed some months in advance of the hearing (and hence rejection of other potential work for the duration of the trial); and further preparation that may be required during the course of the hearing that would not be covered by the Refresher.

## SERVICES RENDERED BY RICHARD SNOWDEN OC DURING THE PERIOD

- incurred in respect of two separate matters. He represented LBHI at a trial before the Chancery Division of the High Court (Mr. Justice Briggs) of an application by the administrators of Lehman Brothers International Europe (LBIE) for determinations and directions in respect of the correct application of the Client Money Rules of the UK Financial Services Authority to client monies left in LBIE's accounts following its entry into administration. Richard Snowden QC's representation of LBHI in this matter involved extensive preparatory work prior to the trial, and attendance and appearance at Court, including the making of submissions on behalf of LBHI at the appropriate juncture during the hearing which took place between 9<sup>th</sup> November 2009 and 24<sup>th</sup> November 2009.
- Brothers Special Financing Inc. (LBSF), an affiliated debtor of LBHI, in the Belmont and Perpetual cases. Richard Snowden QC had represented LBSF at the appeal hearing in October 2009, and the judgment of the Court of Appeal was delivered on 6 November 2009, [2009] EWCA Civ 1160. He was then engaged in preparing submissions consequent upon the judgment, including submissions on the order to be made, costs and an application to the Court of Appeal for permission to appeal to the Supreme Court (which was refused). This also involved reviewing the other parties' written submissions on the same subjects. He also drafted a petition to the Supreme Court itself for permission to appeal (which was granted).
- Belmont and Perpetual matters, LBSF instructed Richard Snowden QC to review and provide detailed comments on a letter which was intended to be sent to the Chancellor of the High Court who had retained overall conduct of the proceedings and had been in communication with the Honorable Judge James M. Peck in the US Bankruptcy Court in connection with the parallel US proceedings between LBSF and BNY. Finally, Richard Snowden QC was

instructed to prepare for and attend a hearing in the Chancery Division of the High Court before Mr Justice Henderson on November 16, 2009 concerning a letter of request which Perpetual had argued should be sent to the Honorable Judge James M. Peck before a hearing (in the US parallel case) which was due to take place in New York the following week. Richard Snowden QC also attended Judgment in that matter which was given on November 17, 2009: [2009] EWHC 2953(Ch).

18. Richard Snowden QC believes that the award of compensation requested in this Application is fair and reasonable and is line with amounts charged in similar matters by Queen's Counsel of similar expertise and experience. Richard Snowden QC requests that this Court award all fees sought in this Application.

### THE REQUESTED COMPENSATION SHOULD BE ALLOWED

19. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 to govern the Court's award of such compensation. 11 U.S.C. § 331. Section 330 provides that a court may award a professional employed under section 327 of the Bankruptcy Code "reasonable compensation for actual necessary services rendered and reimbursement for actual, necessary expenses." Id. § 330(a)(1). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded, the court should consider the nature, the extent, and the value of such services, taking into account all relevant factors, including —

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under [the Bankruptcy Code];

- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and
- (E) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under [the Bankruptcy Code].

<u>Id.</u> § 330(a)(3).

20. In the instant case, Richard Snowden QC respectfully submits that the services for which he seeks compensation in this Application were necessary for and beneficial to the Debtors' preservation, the orderly administration of their estates, and the prosecution of their chapter 11 cases. The professional services were performed expediently and efficiently. The compensation requested herein is reasonable in light of the nature, extent, and value of such services to the Debtors, their estates, and all parties in interest. Compensation for the foregoing services as requested is commensurate with the complexity, importance and nature of the problems, issues and tasks involved. Approval of the compensation for professional services sought herein is warranted.

#### **CONCLUSION**

21. Richard Snowden QC respectfully requests that this Court enter an order substantially in the form attached as Annexure "A" approving the payment of GB£130,812.50 (US\$215,579.00) as the fair and reasonable value of his actual and necessary professional services rendered by him to the Debtors during the Period.

Richard Snowden QC Erskine Chambers 33 Chancery Lane London UK WC2A 1EN

Ordinary Course Professional for Lehman Brothers Holdings, Inc *et al*, Debtors-in-Possession

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

: Chapter 11 Case No.
: Debtors.

Debtors.

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# STATEMENT PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2016(b)

- 1. I am Richard Snowden, Queen's Counsel, an Ordinary Course Professional for Lehman Brothers Holdings, Inc (**LBHI**) and its affiliated Debtors in the above referenced chapter 11 cases (collectively referred to as **Lehman** or the **Debtors**).
- 2. I submit that all of the professional services for which the annexed Application is made have been rendered solely for the benefit of the Debtors' estate and its creditors.
- 3. No agreement exists between me and any other person, firm or entity concerning the compensation or reimbursement received as a result of this case.
- 4. I have received no retainer in the cases and have made no agreements with the Debtor for compensation or reimbursement.
- 5. I have received no transfer, assignment or pledge of property of the Debtors' estate except pursuant to an Order of the Court for compensation.

London, United Kingdom Dated:

21 April 2011

Respectfully submitted,

Richard Snowden, Queen's Counsel

Erskine Chambers 33 Chancery Lane London UK WC2A 1EN

Telephone +44 20 7242 5532 rsnowden@erskine-chambers.co.uk

Ordinary Course Professional for Lehman Brothers Holdings, Inc *et al*, Debtors-in-Possession Richard Snowden QC Erskine Chambers 33 Chancery Lane London UK WC2A 1EN

Ordinary Course Professional for Lehman Brothers Holdings, Inc *et al*, Debtors-in-Possession

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

### **CERTIFICATION OF PROFESSIONAL**

I am Richard Snowden, Queen's Counsel, an Ordinary Course Professional for Lehman Brothers Holdings, Inc (**LBHI**) and its affiliated Debtors in the above referenced chapter 11 cases (collectively referred to as **Lehman** or the **Debtors**). I hereby certify as follows:

- 1. I have read the foregoing application (Application).
- 2. To the best of my knowledge, information and belief, formed after reasonable inquiry, the Application substantially complies with the United States Trustee Fee Guidelines Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. 330 (UST Guidelines) and the Administrative Order No 389 RE: Amended Guidelines for Fees and Disbursements for Professionals in the Southern District of New York Bankruptcy Cases (Amended Guidelines).
- 3. To the best of my knowledge, information and belief, formed after reasonable inquiry, except to the extent that fees or disbursements are prohibited by the Amended Guidelines or the UST Guidelines, the fees sought in the Application are billed at rates and in accordance with practices employed by me, the Applicant, and generally accepted by my clients.

- 4. LBHI and Lehman Brothers Special Financing Inc. have been provided with a copy of the Application prior to the date set by the Court or any applicable rules for filing fee applications, have reviewed the Application and have approved it.
- 5. No reimbursable services have been requested. In any event I do not make a profit on such services, even if provided.

London, United Kingdom Dated:

21 April 2011

Respectfully submitted,

Richard Snowden, Queen's Counsel

Erskine Chambers 33 Chancery Lane London UK WC2A 1EN

Telephone +44 20 7242 5532 rsnowden@erskine-chambers.co.uk

Ordinary Course Professional for Lehman Brothers Holdings, Inc *et al*, Debtors-in-Possession Annexure A – Proposed Order

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

-----X

In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

Debtors. : (Jointly Administered)

-----X

ORDER GRANTING APPLICATION FOR THE
ALLOWANCE OF FINAL COMPENSATION FOR THE
PERIOD OF NOVEMBER 1, 2009 THROUGH NOVEMBER 30, 2009
FOR PROFESSIONAL SERVICES PERFORMED AND REIMBURSEMENT
OF ACTUAL AND NECESSARY EXPENSES INCURRED BY RICHARD SNOWDEN, QC

Upon consideration of the application (the "Application") for allowance of compensation for professional services performed and reimbursement of actual and necessary expenses incurred during the period of November 1, 2009 through November 30, 2009 (the "Application Period"), pursuant to sections 330(a) and 331 of title 11 of the United States Code (the "Bankruptcy Code") and Rule 2016 of the Federal Rules of Bankruptcy Procedure, filed by Richard Snowden, QC; and after due notice pursuant to the second amended order dated June 17, 2010 governing case management and administrative procedures in these chapter 11 cases [Docket No. 9635]; and there being no objections to the Application; and after due consideration and upon all of the proceedings held before the Court, and sufficient cause appearing therefore, it is hereby

### ORDERED:

1. The Application is granted to the extent provided in <u>Exhibit A</u> annexed hereto.

- 2. Final compensation to Richard Snowden, QC for professional services performed during the Application Period is allowed and awarded in the amounts set forth in <u>Exhibit A</u> in the column entitled "Fees Awarded" pursuant to section 331 of the Bankruptcy Code.
- 3. The Debtors are authorized and directed to pay, pursuant to this order, the "Fees Requested" by Richard Snowden, QC as set forth in Exhibit A, to the extent not previously paid pursuant to the Amended Order Authorizing the Debtors to Employ Professionals Utilized in the Ordinary Course of Business, dated March 25, 2010 [Docket No. 7822] or otherwise.

Dated:				_, 2011	
	New	York,	New	York	

UNITED STATES BANKRUPTCY JUDGE

## EXHIBIT A

Current Fee Period: November 1, 2009 to November 30, 2009

Initials: USBJ		, 2011	Date:
\$215,579.00	\$215,579.00	[ ], 2011 Docket No. [ ]	Richard Snowden, QC
Fees Awarded	Fees Requested	Date/ Document No. of Application	Applicant

Schedule A(1)

Summary: All Fee Periods (Including November 1, 2009 to November 30, 2009)	Applicant Total Total Total Fees Requested Fees Awarded

	Jpiikalit	Fees Requested	ees Requested Fees Awarded	
Richard	Richard Snowden, QC	\$215,579.00	\$215,579.00	
Schedule A(2)	Date:	, 2011	Initials:	USE.

33 Chancery Lane, London, WC2A 1EN

## Professional Fees of Mr. Richard Snowden Q.C.

VAT Registration Number: 466 3921 25

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Email: clerks@erskine-chambers.co.uk
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Please quote case reference number on all correspondence

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Date 17/01/2011 Case Ref No 044191 Solicitor Ref No TH/MS/LC/AF/58399.0003.
Case Type Insolvency
Case Name LEHMAN BROTHERS HOLDINGS INCORP (CLIENT MONIES - APPLICATION FOR DIRECTIONS BY ADMINISTRATOR OF
LEHMAN BROS INTERNATIONAL EUROPE)

Date	Description	Amount	VAT	Total
26/10/2009	Skeleton Argument	0.00	0.00	0.00
30/10/2009	Advising Jointly by Telephone	0.00	0.00	0.00
02/11/2009	Further papers received (further trial bundles).	0.00	0.00	0.00
03/11/2009	FEES AGREED - BRIEF £50,000 TO INCLUDE SKELETON ARGUMENT PLUS £6500 PER DAY REFRESHER DURING HEARING APPLIED PRO RATA FOR EACH DAY WORKED	0.00	0.00	0.00
05/11/2009	Advising in Joint Consultation with Mr. Ben Shaw	0.00	0.00	0.00
09/11/2009	Brief on Hearing before Judge	50,000.00	7,500.00	57,500.00
09/11/2009	Time engaged: COURT DAY + PREPARATION FOR TRIAL + SKELETON ARGUMENT			0.00
10/11/2009	Refresher	6,500.00	975.00	7,475.00
10/11/2009	Time engaged: COURT DAY + ANY ANCILLARY PREPARATION ARISING			0.00
11/11/2009	Refresher (no attendance required).	0.00	0.00	0.00
11/11/2009	Advising in Consultation by telephone	3,750.00	562.50	4,312.50
11/11/2009	Time engaged: 5HRS			0,00
12/11/2009	Refresher (no attendance required).	0.00	0.00	0.00
13/11/2009	Refresher	3,500.00	525.00	4,025.00
13/11/2009	Advising by Telephone	0.00	0.00	0.00

Amount (excluding VAT) Carried Forward to Next Page £63,750.00

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#### Professional Fees of Mr. Richard Snowden Q.C.

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Please quote case reference number on all correspondence

Date 17/01/2011 Case Ref No 044191	Solicitor Ref No TH/MS/LC/AF/58399.0003.
Caec (G) (IC	
Case Type Insolvency	
Case Name LEHMAN BROTHERS HOLDINGS INCORP (	CLIENT MONIES - APPLICATION FOR DIRECTIONS BY ADMINISTRATOR OF
LEHMAN BROS INTERNATIONAL EUROPE)	

Date	Description	Amount	VAT	Total
13/11/2009	Time engaged: PART COURT DAY + CALL + ANY ANCILLARY PREPARATION ARISING			0.00
16/11/2009	Refresher (no attendance today).	0.00	0.00	0.00
17/11/2009	Refresher	6,500.00	975.00	7,475.00
17/11/2009	Time engaged: COURT DAY + ANY ANCILLARY PREPARATION ARISING			0.00
18/11/2009	Refresher	6,500.00	975.00	7,475.00
18/11/2009	Time engaged: COURT DAY + ANY ANCILLARY PREPARATION ARISING			0.00
19/11/2009	Refresher	1,500.00	225.00	1,725.00
19/11/2009	Time engaged: PART COURT DAY + ANY ANCILLARY PREPARATION ARISING			0.00
20/11/2009	Refresher	3,500.00	525.00	4,025.00
20/11/2009	Time engaged: PART COURT DAY + ANY ANCILLARY PREPARATION ARISING			0.00
23/11/2009	Refresher	6,500.00	975.00	7,475.00
23/11/2009	Time engaged: COURT DAY + ANY ANCILLARY PREPARATION ARISING			0.00
24/11/2009	Refresher	3,000.00	450.00	3,450.00
24/11/2009	Time engaged: PART COURT DAY + ANY ANCILLARY PREPARATION ARISING			0.00

Amount (excluding VAT) Carried Forward to Next Page £91,250.00

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#### Professional Fees of Mr. Richard Snowden Q.C.

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Please quote case reference number on all correspondence

Paramountain transport	
Date 17/01/2011 Case Ref No 044	191 Solicitor Ref No. TH/MS/LC/AF/58399.0003.
Case Type Insolvency	. Kara sa sana ta na paliking manandina na Sikita ngang Pinang bilika an palakana na kata sa
Case Name LEHMAN BROTHERS HOLDINGS INCO	RP (CLIENT MONIES - APPLICATION FOR DIRECTIONS BY ADMINISTRATOR OF
LEHMAN BROS INTERNATIONAL EURO	PE)

Date	Description	Amount	VAT	Total
26/11/2009	Supplemental Written Submissions	2,000.00	300.00	2,300.00
26/11/2009	Time engaged: 2.5HRS			0.00

Please make cheques payable to Mr. Richard Snowden Q.C.	This fee note supersedes previous fee notes
A	mount £ 93,250.00  VAT £ 13,987.50  Total £ 107,237.50
Previously rendered on	
See Above	

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## Professional Fees of Mr. Richard Snowden Q.C.

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Please quote case reference number on all correspondence

	- 40
Date 12/01/2011 Case Ref No 044874 Solicitor Ref No Gemma Bullmore	
Date 1201/2011 Case Rei NO OFFICIA Solicito, Rei NO OFFICIA Solicito, Rei NO	
	1
Case Type Insolvency	į
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Case Name PERPETUAL TRUSTEE CO LTDV- BANK OF NEW YORK TRUSTEE SERVICES LTD & LEHMAN BROTHERS SPECIAL	
	i
FINANCING INC LETTER OF REQUEST APPLICATION - (FEES PAYABLE BY: LEHMAN BROTHERS HOLDINGS INC	-
Accounts Payable, 45th Floor, 1271 Avenue of the Americas, New York, NY 10020)	
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Date	Description	Amount	VAT	Total		
05/11/2009	Settling draft Letter to the Chancellor (Morritt J)	1,000.00	150.00	1,150.00		
05/11/2009	Time engaged: 1.5HRS			0.00		
09/11/2009	Case to Advise received (2 files)	0.00	0.00	0.00		
11/11/2009	Settling draft Evidence	4,500.00	675.00	5,175.00		
11/11/2009	Time engaged: 6HRS			0.00		
13/11/2009	Further papers received (bundle for hearing)	0.00	0.00	0.00		
13/11/2009	Skeleton Argument	4,000.00	600.00	4,600.00		
16/11/2009	Brief on Application before Judge (Henderson J.).	6,000.00	900.00	6,900.00		
16/11/2009	Time engaged: HALF COURT DAY + 10 HOURS PREP INLCUDING SKELETON ARGUMENT					
17/11/2009	Attending Judgment	0.00	0.00	0.00		
26/01/2010	Fees received. Document No: R11513RAS841, Date and Tax Point: 26/01/2010	-15,500.00	-2,325.00	-17,825.00		

Please make cheques payable to Mr. Richard Snowden Q.C.  This fee note supersedes previous	us fee notes
VAT Fees Rate % VAT Amount	£ 0.00
Summary	£ 0.00
Total	£ 0.00
Previously rendered on	
18/12/2009 and 04/12/2009	

33 Chancery Lane, London, WC2A 1EN

## Professional Fees of Mr. Richard Snowden Q.C.

VAT Registration Number: 466 3921 25

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Please quote case reference number on all correspondence

Date 12/01/2011 Case Ref No 044288 Solicitor Ref No GEMMA BULLMORE

Case Type Insolvency

Case Name BELMONT PARK INVESTMENTS PTY LTS -V- BNY CORPORATE TRUSTEE SERVICES LIMITED

Date	Description	Amount	VAT	Total
05/11/2009	Settling draft Submissions for leave to appeal and on costs (50% of fee)	2,500.00	375.00	2,875.00
05/11/2009	Time engaged: 6-7 HOURS			0.00
06/11/2009	Judgment (no attendance required)	0.00	0.00	0.00

Please make o	heques payable	to Mr. Richard Sno	owden Q.C.	This fee note supersedes previous fee notes	
VAT	Food	Rate %	VAT	Amount £ 2,500.00	
Summary	Fees £2,500.00	15.00	£ 375.00	Amount £ 2,500.00	
	22,300.00	13.00	2 373.00	VAT £ 375.00	
				Total £ 2,875.00	
				Total 22,510.00	
Previously rend	dered on	etti esitua de la p			
See Above					

33 Chancery Lane, London, WC2A 1EN

## Professional Fees of Mr. Richard Snowden Q.C.

VAT Registration Number: 466 3921 25

Weil Gotshall & Manges
Solicitors for
Lehman Brothers Holdings Inc.
Accounts Payable
45th Floor,1271 Avenue of the Americas
New York
NY 10020

Tel: +44 (0)20 7242 5532 Fax: +44 (0)20 7831 0125

Dx: 308 London Chancery Lane Email: clerks@erskine-chambers.co.uk www.erskine-chambers.co.uk

Please quote case reference number on all correspondence

40/04/0044
Date 12/01/2011 Case Ref No 044153 Solicitor Ref No Gemma Bullmore
Date 12/01/2011 Case Ref No 044153 Solicitor Ref No Gemma Bullmore
Case Type Insolvency
Case Type mooremay
••
Case Name PERPETUAL TRUSTEE CO LTDV- BANK OF NEW YORK TRUSTEE SERVICES LTD & LEHMAN BROTHERS SPECIAL
Gase Marie: FLITETOAL TROSTEL CO LTDV- BAIN OF NEW TORK TROSTEL SERVICES LTD & LERWAN BROTHERS SPECIAL
FINANCING INC.
FINANCING INC.

Date	Description	Amount	VAT	Total
04/11/2009	Further papers received	0.00	0.00	0.00
05/11/2009	Settling draft Submissions for leave to appeal and on costs (50% of fee)	2,500.00	375.00	2,875.00
05/11/2009	Further papers received by e-mail (draft Submissions from other Counsel).	0.00	0.00	0.00
05/11/2009	Time engaged: 6-7 HOURS			0.00
06/11/2009	Judgment (no attendance required).	0.00	0.00	0.00

Please make o		to Mr. Richard Sno	owden Q.C.	This fee note supersedes previous fee notes
VAT	Fees	Rate %	VAT	Amount £ 2,500.00
Summary	£2,500.00	15.00	£ 375.00	VAT £ 375.00  Total £ 2,875.00
Previously rend	dered on			